

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

v.

HMD GLOBAL OY,

Defendant.

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Case No. 2:20-CV-00078-JRG

JURY TRIAL DEMANDED

**DECLARATION OF MAISSA CHOURAKI IN SUPPORT OF
RENEWED MOTION TO TRANSFER OF HMD GLOBAL OY
UNDER 28 U.S.C. § 1404 TO THE SOUTHERN DISTRICT OF FLORIDA**

I, Maissa Chouraki, hereby declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of California, and an associate at the law firm of Warren Lex LLP, counsel for defendant HMD Global Oy. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, I could and would testify competently to each of them.

2. Attached as Exhibit A are true and correct copies of documents filed with the Texas Secretary of State by Cellular Communications Equipment LLC. HMD Global previously filed this document as Exhibit A to the Declaration of Gabriel A. Peixoto in Support of Motion to Transfer by Defendant HMD Global Oy Under 28 U.S.C. § 1404 to the Southern District of Florida (“Peixoto Decl.”), Docket No. 38-7.

3. Attached as Exhibit B are true and correct copies of documents filed with the Texas Secretary of State by Acacia Research Group LLC. HMD Global previously filed this document as Exhibit B to the Peixoto Declaration, Docket No. 38-8.

4. Attached as Exhibit C is a true and correct copy of <https://www.businesswire.com/news/home/20160915005463/en/A>. HMD Global previously filed this document as Exhibit C to the Peixoto Declaration, Docket No. 38-9.

5. Attached as Exhibit D is a true and correct copy of https://acaciaresearch.com/prviewer/release_only/id/763877. HMD Global previously filed this document as Exhibit D to the Peixoto Declaration, Docket No. 38-10.

6. Attached as Exhibit E is a true and correct copy of Plaintiff's Initial Disclosures served by plaintiff Cellular Communications Equipment LLC on August 10, 2020. HMD Global previously filed this document as Exhibit E to the Peixoto Declaration, Docket No. 38-11.

7. Attached as Exhibit F is a true and correct copy of a document generated by selecting "Save to PDF" on <https://www.linkedin.com/in/eric-lucas-29a0232a/>. HMD Global previously filed this document as Exhibit F to the Peixoto Declaration, Docket No. 38-12.

8. Attached as Exhibit G is a true and correct copy of <https://www.iraq.regus.com/office-space/united-states/texas/frisco/texas-frisco-frisco-square>. HMD Global previously filed this document as Exhibit G to the Peixoto Declaration, Docket No. 38-13.

9. Attached as Exhibit H is a true and correct copy of a document produced by plaintiff Cellular Communications Equipment LLC bearing production numbers

CCE_HMD_001356 through CCE_HMD_001439. HMD Global previously filed this document as Exhibit H to the Peixoto Declaration, Docket No. 38-14.

10. Attached as Exhibit I is a true and correct copy of <https://jegandsons.com/index.php>. HMD Global previously filed this document as Exhibit I to the Peixoto Declaration, Docket No. 38-15.

11. Attached as Exhibit J is a true and correct copy of a document filed with the Florida Secretary of State by Shalbaf LLC. HMD Global previously filed this document as Exhibit J to the Peixoto Declaration, Docket No. 38-16.

12. Attached as Exhibit K is a true and correct copy of Plaintiff's Disclosure of Asserted Claims and Infringement Contentions served by plaintiff Cellular Communications Equipment LLC on July 6, 2020. HMD Global previously filed this document as Exhibit K to the Peixoto Declaration, Docket No. 38-17.

13. Attached as Exhibit L is a true and correct copy of an excerpt from a document available at uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0630.2020.pdf. HMD Global previously filed this document as Exhibit L to the Peixoto Declaration, Docket No. 38-18.

14. Attached as Exhibit M is a true and correct copy of the Declaration of Per Ekman in Support of Motion to Transfer of HMD Global Oy. HMD Global previously filed this document, Docket No. 38-2.

15. Attached as Exhibit N is a true and correct copy of the Declaration of Rex C. Fryhover in Support of Motion to Transfer Of HMD Global Oy. HMD Global previously filed this document, Docket No. 38-3.

16. Attached as Exhibit O is a true and correct copy of the Declaration of Maurizio Angelone in Support of Motion to Transfer of HMD Global Oy. HMD Global previously filed this document, Docket No. 38-4.

17. Attached as Exhibit P is a true and correct copy of the Declaration of Cristina Hoyos in Support of Motion to Transfer of HMD Global Oy. HMD Global previously filed this document, Docket No. 38-5.

18. Attached as Exhibit Q is a true and correct excerpt of the rough transcript of the Deposition of Rex C. Fryhover taken on December 3, 2020.

19. Attached as Exhibit R is a true and correct excerpt of the rough transcript of the Deposition of Per Ekman taken on December 11, 2020.

20. Attached as Exhibit S is a true and correct copy of 1200 Brickell Building Office Lease Between Temis Horizon, LLC and HMD America, Inc.

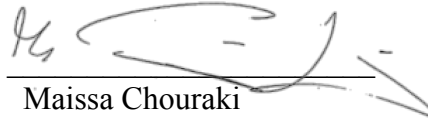
21. Attached as Exhibit T is a true and correct excerpt of the Deposition of Maurizio Angelone taken on November 19, 2020.

22. Attached as Exhibit U is a true and correct copy of import documentation for a shipment of cellphones to HMD America from China.

23. Attached as Exhibit V is a true and correct copy of Plaintiff's Objections and Responses to Defendant's First Set of Interrogatories.

24. Attached as Exhibit W is a true and correct excerpt of the Deposition of Cristina Hoyos taken on November 18, 2020.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
December 14, 2020 in San Francisco, California.


Maissa Chouraki